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10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA  
12 SACRAMENTO DIVISION  
13

14 RICHARD RANIA,

15 Plaintiff,

16 v.

17 ANDREW SAUL,  
Commissioner of Social Security,

18 Defendant.  
19

No. 2:20-cv-01541-MCE-CKD

STIPULATION AND ORDER FOR  
EXTENSION TO FILE MOTION FOR  
SUMMARY JUDGMENT

20 IT IS HEREBY STIPULATED by and between the parties through their undersigned  
21 counsel, subject to the approval of the Court, that Defendant shall have an extension of 30 days to  
22 file his cross-motion for summary judgment, until July 8, 2021.

23 Because of extensions related to the COVID-19 pandemic and delayed production of  
24 certified administrative records throughout the country, the Social Security Administration has  
25 workload imbalances between various regions, requiring attorneys to provide assistance on cases  
26 in other regions. Currently the workload in the United States District Courts for the Eastern and  
27 Western Districts of Missouri is overwhelming the attorneys primarily responsible for briefing  
28 cases in those jurisdictions, even after obtaining multiple extensions. Therefore, other attorneys

1 have received reassignments from those districts that require immediate attention, with no further  
2 extensions possible in many of those cases. The attorney responsible for briefing this case is one  
3 of the attorneys who has received reassignment of urgent cases from those districts.

4 Because Defendant has not sought or received an extension for this brief, Defendant  
5 requests a first extension of thirty days, with a new due date of July 8, 2021. This extension  
6 would allow the Social Security Administration to balance its currently uneven workloads, give  
7 attention to the longest-pending cases, and give complete and appropriate consideration to  
8 briefing this case.

9 Respectfully submitted June 1, 2021.

10 DATED: June 1, 2021

/s/ David Chermol  
DAVID CHERMOL  
(as authorized by email)  
Attorney for Plaintiff

13 PHILLIP A. TALBERT  
14 Acting United States Attorney

15 DATED: June 1, 2021

By s/ Daniel P. Talbert  
DANIEL P. TALBERT  
Special Assistant United States Attorney

17 Attorneys for Defendant

18 ORDER

19 Pursuant to stipulation, it is so ordered.

20 Dated: June 4, 2021

21   
22 CAROLYN K. DELANEY  
23 UNITED STATES MAGISTRATE JUDGE  
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